

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

BRUCE RUSH, as participant in and on behalf  
of the Segerdahl Corporation employee stock  
ownership plan, and on behalf of a class of all  
others who are similarly situated,

Plaintiff,

v.

GREATBANC TRUST COMPANY; MARY  
LEE SCHNEIDER; RICHARD JOUTRAS;  
RODNEY GOLDSTEIN; PETER MASON;  
ROBERT CRONIN; JOHN DOE  
DEFENDANTS 1-10; and SEGERDAHL  
CORP. (D/B/A SG360),

Defendants.

Case No. 1:19-cv-00738

Hon. Andrea R. Wood

Mag. Judge Susan E. Cox

**MOTION OF JACKSON LEWIS, P.C. FOR LEAVE TO WITHDRAW  
AS COUNSEL FOR THE OUTSIDE DIRECTOR DEFENDANTS**

Attorneys Charles F. Seemann, III, Katelyn W. Harrell, Robert Rachal, and Sarah J. Gasperini of Jackson Lewis, P.C. (the “Jackson Lewis Attorneys”), pursuant Local Rule 83.17, hereby respectfully request leave to withdraw as counsel for Defendants Rodney Goldstein, Peter Mason, and Robert Cronin (the “Outside Director Defendants”). The Jackson Lewis Attorneys bring this motion at the direction and with the approval of the Outside Director Defendants, who will continue to be represented by counsel of record William O’Neil and Kevin Simpson of Winston & Strawn LLP. Withdrawal of the Jackson Lewis Attorneys will not prejudice the Outside Director Defendants or any other party, as Attorneys O’Neil and Simpson have represented the Outside Director Defendants since June 2022. *See* Dkts. 283, 284.

WHEREFORE, for the foregoing reasons, the Jackson Lewis Attorneys respectfully request leave to withdraw as counsel for Defendants Rodney Goldstein, Peter Mason, and Robert Cronin.<sup>1</sup>

Dated: January 5, 2023

Respectfully submitted,

By: /s/ Katelyn W. Harrell  
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**COUNSEL FOR DEFENDANTS  
GREATBANC TRUST COMPANY,  
MARY LEE SCHNEIDER, RICHARD  
JOUTRAS, RODNEY GOLDSTEIN,  
PETER MASON, ROBERT CRONIN,  
AND SEGERDAHL CORP D/B/A  
SG360°**

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<sup>1</sup> The Jackson Lewis Attorneys will remain counsel of record for Defendants Greatbanc Trust Company, Mary Lee Schneider, Richard Joutras, and Segerdhal Corp.

**CERTIFICATE OF SERVICE**

I, Katelyn W. Harrell, certify that on January 5, 2022, I caused this pleading to be filed with the Court by electronic filing protocols, and that same will therefore be electronically served upon all attorneys of record registered with the Court's ECF/CM system.

/s/ Katelyn W. Harrell